

KEKER & VAN NEST, LLP
 ROBERT A. VAN NEST - # #84065
 JAN N. LITTLE - #100029
 MICHAEL D. CELIO - #197998
 710 Sansome Street
 San Francisco, CA 94111-1704
 Telephone: (415) 391-5400
 Facsimile: (415) 397-7188

Attorneys for Defendants
 ELECTRONIC ARTS, INC., BRUCE McMILLAN,
 JOEL LINZNER, WARREN C. JENSON,
 GERHARD FLORIN, LAWRENCE F. PROBST, III,
 DON A. MATTRICK, NANCY L. SMITH, and
 J. RUSSELL RUEFF, JR.

ADDITIONAL COUNSEL LISTED ON SIGNATURE PAGE

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

BARRY BAKER, Individually and On Behalf
 of All Others Similarly Situated,

Plaintiff,

v.

ELECTRONIC ARTS, INC., WARREN C.
 JENSON, and LAWRENCE F. PROBST, III,

Defendants.

Case No. C 05-01219 MMC

**STIPULATION AND ~~PROPOSED~~
 ORDER TO CONSOLIDATE RELATED
 ACTIONS AND ESTABLISH BRIEFING
 SCHEDULE**

Judge: Maxine M. Chesney

DANIEL TAUBENFELD, Individually and
 On Behalf of All Others Similarly Situated,

Plaintiff,

v.

ELECTRONIC ARTS, INC., WARREN C.
 JENSON, and LAWRENCE F. PROBST, III,

Defendants.

Case No. CV 05-01325 MHP

CLASS ACTION

DANIEL SWANTKO, On Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

vs.

ELECTRONIC ARTS, INC., BRUCE McMILLAN,
JOEL LINZNER, LAWRENCE F. PROBST, III,
GERHARD FLORIN, WARREN C. JENSON,
DON A. MATTRICK, NANCY L. SMITH, and J.
RUSSELL RUEFF, JR.,

Defendants.

Case No. C-05-01527 MJJ

CLASS ACTION

ELTON SIMPSON, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

ELECTRONIC ARTS, INC., LAWRENCE
PROBST, III, and WARREN JENSON,

Defendants.

Case No. C-05-1616 JSW

CLASS ACTION

Pursuant to FRCivP 16(e) and 42(a), Civil L.R. 16-8(b), and Manual for Complex

Litigation, Third §§ 21.12, 21.21 and 33.3 (1995), the parties stipulate, and the Court hereby
orders, as follows:

CONSOLIDATION OF RELATED CASES

STIPULATION AND ~~PROPOSED~~ ORDER TO CONSOLIDATE CASES
Case No. C 05-01219 MMC

2. All related actions that are subsequently filed in, or transferred to, this District shall be consolidated into the Consolidated Action for pretrial purposes. This Order shall apply to every such related action, absent order of the Court. A party that objects to such consolidation, or to any other provision of this Order, must file an application for relief from this Order within thirty (30) days after the date on which a copy of the order is mailed to the party's counsel, pursuant to Paragraph 7, *infra*.

3. This Order is entered without prejudice to the rights of any party to apply for severance of any claim or action, for good cause shown.

4. The docket in Civil Action No. C-05-1219 MMC shall constitute the Master Docket for this action.

5. Every pleading filed in the Consolidated Action shall bear the following caption:

NORTHERN DISTRICT OF CALIFORNIA

In re ELECTRONIC ARTS, INC.)	
SECURITIES LITIGATION)	Master File No. C-05-1219 MMC
)	
)	
)	CLASS ACTION

1 This Document Relates To:)
 2)
 3)

4 6. The file in Civil Action No. C-05-1219 MMC shall constitute the Master File for
 5 every action in the Consolidated Action. When the document being filed pertains to all actions,
 6 the phrase "All Actions" shall appear immediately after the phrase "This Documents Relates
 7 To:". When a pleading applies only to some, not all, of the actions, the document shall list,
 8 immediately after the phrase "This Documents Relates To:", the docket number for each
 9 individual action to which the document applies, along with the last name of the first-listed
 10 plaintiff in said action (e.g., "No. C-03-_____ (Doe))."

12 7. The parties shall file a Notice of Related Cases pursuant to Civil L.R. 3-12
 13 whenever a case that should be consolidated into the Consolidated Action is filed in, or
 14 transferred to, this District. If the Court determines that the case is related, the clerk shall:
 15

- 16 a. place a copy of this Order in the separate file for such action;
- 17 b. serve on plaintiff's counsel in the new case a copy of this Order;
- 18 c. direct that this Order be served upon defendants in the new case; and
- 19 d. make the appropriate entry in the Master Docket.

20 **LEAD PLAINTIFF'S COUNSEL**

21
 22 8. After the Court has designated a Lead Plaintiff and appointed Lead Counsel,
 23 pursuant to 15 U.S.C. § 78u-4(a)(3)(B), Lead Counsel shall have the authority to speak for, and
 24 enter into agreements on behalf of, plaintiffs in all matters regarding pretrial procedures,
 25 discovery, and settlement negotiations on behalf of the proposed class. Lead Counsel shall
 26

1 manage the prosecution of this litigation to avoid duplicative or unproductive activities. Lead
2 Counsel shall be responsible for coordination of all activities and appearances on behalf of
3 plaintiffs and for dissemination of notices and orders of this Court. Lead Counsel shall be
4 responsible for communications with the Court. Lead Counsel shall maintain a master service
5 list of all parties and counsel.
6

7 9. Defendants' counsel may rely upon agreements made with Lead Counsel. Such
8 agreements shall be binding on all plaintiffs and their counsel.

9 10. Any counsel of record for a party in the Consolidated Action who is not a member
10 of the Bar of this District is hereby admitted to practice pro hac vice in this action by virtue of the
11 Stipulation as so ordered.
12

13 PLEADINGS AND MOTIONS

14 11. Defendants are not required to respond to the complaint in any action consolidated
15 into the Consolidated Action, other than a consolidated complaint or a complaint designated as
16 the operative complaint after the designation of a Lead Plaintiff and the appointment of Lead
17 Counsel.
18

19 12. Lead Plaintiff shall file a consolidated complaint within sixty (60) days after the
20 Court enters the order designating the Lead Plaintiff, unless otherwise agreed upon by the parties
21 or per scheduling order of this Court. The consolidated complaint shall be the operative
22 complaint and shall supersede all complaints filed in any of the actions consolidated herein.
23

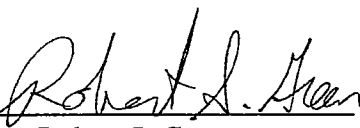
24 13. Defendants shall respond to the consolidated complaint within forty-five (45) days
25 after service, unless otherwise agreed upon by the parties or per scheduling order of this Court. If
26 defendants file any motions directed at the consolidated complaint, the opposition and reply
27

briefs shall be filed within sixty (60) days and seventy-five (75) days, respectively, of that response, unless otherwise agreed upon by the parties or per scheduling order of this Court.

14. All case management conferences shall be rescheduled to take place after this Court's resolution of any motions directed at the consolidated complaint, unless otherwise agreed upon by the parties or per scheduling order of this Court.

15. The parties shall serve all papers on each other in accordance with Northern District Local Rules by hand or by overnight delivery, and by facsimile, unless otherwise agreed upon by the parties or per scheduling order of this Court. Notwithstanding the foregoing, defendants may serve plaintiffs' counsel, other than Lead Plaintiff's Counsel, by first-class mail, unless otherwise agreed upon by the parties.

Dated: April 26, 2005

By: 
Robert S. Green

GREEN WELLING LLP
235 Pine Street, 15th Floor
San Francisco, California 94104
Telephone: (415) 477-6700
Facsimile: (415) 477-6710

Marc A. Topaz
Richard A. Maniskas
SCHIFFRIN & BARROWAY, LLP
280 King of Prussia Rd.
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056

Attorneys for Plaintiff Baker

1
2 Dated: April 27, 2005

By: Kristen McCulloch

3 Jeff S. Westerman
4 Elizabeth P. Lin
5 Kristen McCulloch
6 MILBERG WEISS BERSHAD & SCHULMAN
7 LLP
8 353 S. Grand Avenue, Suite 4170
9 Los Angeles, CA 90071
10 Telephone: (213) 617-1200
11 Facsimile: (213) 617-9185

12 *Attorneys for Plaintiff Tauhanfeld*

13 Dated: April _____, 2005

By: _____

14 LERACH COUGHLIN STOIA GELLER
15 RUDMAN & HOBBS LLP
16 Patrick J. Coughlin
17 100 Pine Street, Suite 2600
18 San Francisco, CA 94111
19 Telephone: (415) 288-4545
20 Facsimile: (415) 288-4534

-and-

21 William S. Lerach
22 Darren J. Robbins
23 401 B Street, Suite 1600
24 San Diego, CA 92101
25 Telephone: (619) 231-1038
26 Facsimile: (619) 231-7423

27 *Attorneys for Plaintiff Swadko*

STIPULATION AND ~~ORDER~~ ORDER TO CONSOLIDATE CASES
Case No. C 04-01219 MMC

1
2 Dated: April __, 2005

By: _____

3 Jeff S. Westerman
4 Elizabeth P. Lin
5 Kristen McCulloch
6 **MILBERG WEISS BERSHAD & SCHULMAN**
7 **LLP**
8 355 S. Grand Avenue, Suite 4170
9 Los Angeles, CA 90071
10 Telephone: (213) 617-1200
11 Facsimile: (213) 617-9185

Attorneys for Plaintiff Taubenfeld

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27 Dated: April 27, 2005

By: 

LERACH COUGHLIN STOLIA GELLER
RUDMAN & ROBBINS LLP
Patrick J. Coughlin
100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: (415) 288-4545
Facsimile: (415) 288-4534

-and-

William S. Lerach
Darren J. Robbins
401 B Street, Suite 1600
San Diego, CA 92101
Telephone: (619) 231-1058
Facsimile: (619) 231-7423

Attorneys for Plaintiff Swanko

STIPULATION AND ~~PROPOSED~~ ORDER TO CONSOLIDATE CASES
Case No. C 05-01219 MMC

7

1 Dated: April 26, 2005

By: Robert S. Green

Robert S. Green

GREEN WELLING LLP

235 Pine Street, 15th Floor

San Francisco, California 94104

Telephone: (415) 477-6700

Facsimile: (415) 477-6710

Marc L. Ackerman

Evan J. Smith

BRODSKY & SMITH, LLC

Two Bala Plaza, Suite 602

Bala Cynwyd, PA 19004

Telephone: (610) 667-6200

Facsimile: (610) 667-9029

Attorneys for Plaintiff Simpson

By: Jan Nielsen Little

Jan Nielsen Little

KEKER & VAN NEST LLP

710 Sansome Street

San Francisco, CA 94111

Telephone: (415) 391-5400

Facsimile: (415) 397-7188

Attorneys for Defendants

ORDER

On the stipulation of the parties, and good cause appearing, IT IS SO ORDERED.
This consolidation order also applies to Wilson v. Electronic Arts, Inc., C-05-1648
MMC, which previously has been related to the above-titled actions.

DATED: May 10, 2005



STIPULATION AND ~~PROPOSED~~ ORDER TO CONSOLIDATE CASES
Case No. C 05-01219 MMC

Exhibit A

Related Cases

1. *Barry Baker v. Electronic Arts, Inc., et al.*, filed in the United States District Court for the Northern District of California on March 24, 2005, Case No. C-05-1219 MMC;
2. *Daniel Taubenfeld v. Electronic Arts, Inc., et al.*, filed in the United States District Court for the Northern District of California on March 31, 2005, Case No. C-05-1325 MHP;
3. *Daniel Swantko v. Electronic Arts, Inc., et al.*, filed in the United States District Court for the Northern District of California on April 13, 2005, Case No. C-05-1527 MJJ;
4. *Elton Simpson v. Electronic Arts, Inc., et al.*, filed in the United States District Court for the Northern District of California on April 19, 2005, Case No. C-05-1616 JSW.
5. *Wilson v. Electronic Arts, Inc., et al.*, filed in the United States District Court for the Northern District of California on April 20, 2005, Case No. C-05-1648 MMC.